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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF WILLIAM A. LEVIN
IN SUPPORT OF LEVIN SIMES
PLAINTIFFS' OPPOSITION TO
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S MOTION TO DISMISS CASES
FOR FAILURE TO COMPLY WITH
DISCOVERY ORDER**

This Document Relates to:

*Jane Doe LS 98 v. Uber Technologies, Inc., et
al.*, Case No. 3:23-cv-05412-CRB

*Jane Doe LS 326 v. Uber Technologies, Inc., et
al.*, Case No. 3:23-cv-05415-CRB

*Jane Doe LS 245 v. Uber Technologies, Inc., et
al.*, Case No. 3:23-cv-05944-CRB

*Jane Doe LS 268 v. Uber Technologies,
Inc., et al.*, Case No. 3:24-cv-05910-CRB

*Jane Doe LS 546 v. Uber Technologies, Inc., et
al.*, Case No. 3:24-cv-09186-CRB

*Jane Doe LS 547 v. Uber Technologies, Inc., et
al.*, Case No. 3:24-cv-09208-CRB

Judge: Honorable Charles R. Breyer
Date: August 22, 2025
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

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1 *Jane Doe LS 548 v. Uber Technologies, Inc., et*
2 *al.*, Case No. 3:24-cv-09211-CRB

3 *Jane Doe LS 550 v. Uber Technologies, Inc., et*
4 *al.*, Case No. 3:25-cv-01327-CRB

5 *Jane Doe LS 553 v. Uber Technologies, Inc., et*
6 *al.*, Case No. 3:25-cv-01493-CRB

7 *Jane Doe LS 554 v. Uber Technologies, Inc., et*
8 *al.*, Case No. 3:25-cv-01693-CRB

9 *Jane Doe LS 580 v. Uber Technologies, Inc., et*
10 *al.*, Case No. 3:25-cv-02460-CRB

11 *Jane Doe LS 582 v. Uber Technologies, Inc., et*
12 *al.*, Case No. 3:25-cv-02792-CRB

13 *Jane Doe LS 584 v. Uber Technologies, Inc., et*
14 *al.*, Case No. 3:25-cv-02806-CRB

15 *Jane Doe LS 589 v. Uber Technologies, Inc., et*
16 *al.*, Case No. 3:25-cv-03216-CRB

17 *Jane Doe LS 590 v. Uber Technologies, Inc., et*
18 *al.*, Case No. 3:25-cv-03217-CRB

19 *Jane Doe LS 592 v. Uber Technologies, Inc., et*
20 *al.*, Case No. 3:25-cv-03266-CRB

21 *Jane Doe LS 593 v. Uber Technologies, Inc., et*
22 *al.*, Case No. 3:25-cv-03269-CRB

23 *Jane Doe LS 594 v. Uber Technologies, Inc., et*
24 *al.*, Case No. 3:25-cv-03274-CRB

I, William A. Levin declare as follows:

1. I am an attorney who is duly licensed to practice law before all courts of the State of California. I am a partner the law firm Levin Simes LLP, and counsel of record for Jane Doe LSA and Jane Doe LS Plaintiffs in MDL No. 3084. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

2. This declaration is made in support of Levin Simes Plaintiffs' Opposition to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Cases for Failure to Comply with Discovery Order.

3. Since this issue was with respect to Levin Simes cases overall in November 2024, Levin Simes has been able to cure the vast majority of the unproduced fact sheets, and we expect we will continue to cure them.

4. Our firm's efforts to reach the Plaintiff subject to Uber's motion include numerous phone calls, emails, texts, written letters, and address searches. We also employed investigators to trace new contact information for these individuals.

5. Uber identifies 18 Plaintiffs, however Plaintiff Jane Doe LS 546 produced her fact sheet on July 28, 2025.

6. We now believe that four of the Levin Simes Plaintiffs subject to this motion are incarcerated and two are deceased.

7. Furthermore, four of these Plaintiff were originally filed in the JCCP and subject to the Court's August 27, 2024 filing deadline.

8. Uber brought a similar request in the JCCP before Judge Schulman. Judge Schulman denied the request because the cases were stayed, and bellwethers were already selected.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 30, 2025, in San Francisco, California.

Respectfully Submitted,

/s/ William A. Levin

William A. Levin

Attorney for LS Plaintiffs